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6 *Special Insurance Counsel to*

7 *The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

Case No. 23-30564

Chapter 11

11 *In re:*

12 THE ROMAN CATHOLIC

13 ARCHBISHOP OF SAN FRANCISCO,

14 Debtor and Debtor in Possession.

**COVER SHEET TO FOURTH INTERIM FEE
APPLICATION OF BURNS BAIR LLP AS
SPECIAL INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF OCTOBER 1, 2024
THROUGH JANUARY 31, 2025**

Judge: Hon. Dennis Montali

Date: April 10, 2025

Time: 1:30 p.m. (Pacific Time)

Objection Deadline: March 20, 2025

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

1	Name of Applicant:	Burns Bair LLP
2	Name of Client:	The Official Committee of Unsecured Creditors
3	Time period covered by this application:	October 1, 2024 – January 31, 2025
4	Total compensation sought this period:	\$152,429.00
5	Total expenses sought this period:	\$11,365.68
6	Petition date:	August 21, 2023
7	Retention date:	October 19, 2023
8	Date of Order approving employment:	November 29, 2023
9	Total compensation allowed by interim order to date:	\$458,559.00
10	Total expenses allowed by interim order to date:	\$6,567.53
11	Total compensation approved by interim order to date:	\$458,559.00
12	Total expenses approved by interim order to date:	\$6,567.53
13	Blended rate in the Interim Application for all attorneys:	\$739.19
14	Blended rate in the Interim Application for all timekeepers:	\$725.51
15	Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$91,284.80
16	Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$5,548.11
17	If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
18	If applicable, difference between fees budgeted and compensation sought for this period:	N/A
19	Number of professionals included in this application:	8
20	Number of professionals billing fewer than 15 hours to the case during this period:	4
21	Are any rates higher than those approved or disclosed at retention?	No
22	Interim or Final:	Interim
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SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Requested with Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)
12/02/2024 [Dkt. 933]	10/1/2024 – 10/31/2024	\$33,317.00	\$5.01	\$26,653.60	\$5.01	\$26,653.60	\$5.01
12/26/2024 [Dkt. 956]	11/1/2024 – 11/30/2024	\$42,050.00	\$5,228.58	\$33,616.00	\$5,228.58	\$33,616.00	\$5,228.58
1/30/2025 [Dkt. 973]	12/1/2024 - 12/31/2024	\$38,769.00	\$314.52	\$31,015.20	\$314.52	\$32,208.80	\$314.52
3/04/2025 [Dkt. 1039]	1/1/2025 – 1/31/2025	\$38,323.00	\$5,817.57	\$30,658.40	\$5,817.57	\$0	\$0

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$66,961.77

TIMOTHY W. BURNS (admitted *pro hac vice*)

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Special Insurance Counsel to

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Case No. 23-30564

Chapter 11

In re:

THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor and Debtor in Possession.

**FOURTH INTERIM FEE APPLICATION
OF BURNS BAIR LLP AS SPECIAL
INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF OCTOBER 1, 2024
THROUGH JANUARY 31, 2025**

Judge: Hon. Dennis Montali

Date: April 10, 2025

Time: 1:30 p.m. (Pacific Time)

Objection Deadline: March 20, 2025

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Archbishop of San Francisco (the “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”) hereby submits its Fourth Interim Fee Application (the “**Interim Application**”), for an order, in substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States

Trustee Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013 (the “**U.S. Trustee Guidelines**”), the *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the “**Northern District Guidelines**”), and the Local Bankruptcy Rules for the Northern District of California (the “**Local Rules**”), and the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a Monthly Basis* (the “**Interim Compensation Order**”) [Dkt. No. 212] entered by the Court on October 16, 2023, for interim approval and allowance of (i) compensation for professional services rendered to the Committee from October 1, 2024 through January 31, 2025 (the “**Interim Fee Period**”) and (ii) reimbursement of expenses incurred in connection with such services; and, in support thereof, respectfully represents as follows:

PRELIMINARY STATEMENT

1. Since Burns Bair’s retention by the Committee on October 19, 2023, Burns Bair has been actively engaged in all aspects of the case with the goal of maximizing insurance recoveries to unsecured creditors of the Debtor. Upon its retention, Burns Bair reviewed and analyzed the Debtor’s historical insurance policy materials, researched and analyzed the insurers’ purported coverage defenses and potential insurance litigation and settlements strategies for the Committee, presented to the Committee on case insurance issues, and began to develop the Committee’s overall insurance strategy, among other time-sensitive tasks.

2. These efforts have required Burns Bair to work closely with the Committee and its lead counsel to keep the Committee informed throughout this Chapter 11 Case. Burns Bair has also worked with the Debtor and its professional advisors, always with the goal of maximizing insurance returns for the unsecured creditors.

3. The Interim Application is based upon the points and authorities cited herein, the Declaration of Jesse J. Bair, filed concurrently herewith, the exhibits attached thereto, the pleadings, papers, and records on file in this case, and any evidence or argument that the Court may entertain at the time of the hearing on the Interim Application.

1 **JURISDICTION**

2 4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. sections
3 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges,
4 General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Local Rules. This is a core proceeding
5 pursuant to 28 U.S.C. section 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C.
6 sections 1408 and 1409.

7 **CASE BACKGROUND AND STATUS**

8 **A. Debtor's Bankruptcy Proceedings**

9 5. The Debtor filed a voluntary petition for relief under Chapter 11 of the
10 Bankruptcy Code on August 21, 2023 (the "**Petition Date**"). The Debtor continues to operate
11 its business and manages its properties as a debtor in possession pursuant to sections 1107(a)
12 and 1108 of the Bankruptcy Code. By Order dated February 29, 2024, the Court appointed Elise
13 S. Frejka as fee examiner in this Chapter 11 Case [Dkt. No. 517]. To date, the Debtor has not
14 filed a plan or disclosure statement, and the Applicant does not know when the Debtor anticipates
15 filing one.

16 **B. Selection of the Committee**

17 6. On September 1, 2023, pursuant to Section 1102 of the Bankruptcy Code, the
18 Office of the United States Trustee (the "**U.S. Trustee**") selected interested creditors to serve on
19 the Committee. Pursuant to section 1102(a)(1) of the Bankruptcy Code, the U.S. Trustee
20 appointed nine members to serve on the Committee. On September 14, 2023, the Committee
21 selected Pachulski Stang Ziehl & Jones LLP as its lead counsel. On October 19, 2023, the
22 Committee selected Burns Bair LLP as special insurance counsel.

23 **C. The Committee's Retention of Burns Bair**

24 7. On November 29, 2023, the Court entered the *Order Approving Application of*
25 *the Official Committee of Unsecured Creditors for Order Approving Employment of Burns Bair*
26 *LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors*, effective
27 October 19, 2023 [Dkt. No. 348] (the "**Retention Order**"). The Retention Order authorizes
28 compensation and reimbursement to Burns Bair in accordance with the Bankruptcy Code, the

1 Bankruptcy Rules, the Northern District Guidelines, the Local Rules, and the Interim
2 Compensation Order. Subject to Burns Bair's application to the Court, the Debtor is authorized
3 by the Retention Order to compensate Burns Bair at its standard hourly rates for services
4 performed and to reimburse it for actual and necessary expenses incurred. The Retention Order
5 authorizes Burns Bair to provide the following services to the Committee: (1) analyze,
6 investigate, and assess the availability of coverage under the Debtor's insurance policies; (2)
7 represent the Committee in any adversary proceedings by and between the Debtor and its
8 insurers; (3) engage in potential mediation and/or other resolution of the claims, demands, and/or
9 lawsuits related to the Debtor's insurance policies; (4) advise, negotiate, and advocate on behalf
10 of the Committee with respect to the Debtor's insurance policies; and (5) provide related advice
11 and assistance to the Committee as necessary [Dkt No. 323].

12 **D. Summary of Professional Compensation and Reimbursement of Expenses**
13 **Requested**

14 8. By this Interim Application, the Applicant seeks interim allowance of
15 compensation in the amount of **\$152,429.00** and actual and necessary expenses in the amount of
16 **\$11,365.68** for a total allowance of **\$163,794.68** for the Interim Fee Period.

17 9. All services for which Burns Bair requests compensation were performed for or
18 on behalf of the Committee. Burns Bair has received no promises of payment from any source
19 other than the Debtor for services rendered or to be rendered in any capacity whatsoever in
20 connection with the matters covered by this Interim Application.

21 10. There is no agreement or understanding between Burns Bair and any other person
22 other than the partners of Burns Bair for the sharing of compensation to be received for services
23 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date, Burns
24 Bair has been paid **\$91,284.80** in fees and **\$5,548.11** in expenses for the fees and expenses sought
25 in this Interim Application.

26 11. Burns Bair has billed the Committee in accordance with its existing billing rates
27 and procedures in effect during the Interim Fee Period. These rates are the same rates Burns
28 Bair charges for services rendered by its attorneys and paraprofessionals in comparable matters
and are reasonable given the compensation charged by comparably skilled practitioners in

1 similar matters in both the California and national markets. The Summary Sheet filed herewith
2 contains tables listing the Burns Bair attorneys and paraprofessionals who have performed
3 services for the Committee during the Interim Fee Period, including their job titles, hourly rates,
4 aggregate number of hours worked in this matter, and, for attorneys, the year in which each
5 professional was licensed to practice law. Exhibit D also contains a table summarizing the hours
6 worked by the Firm's attorneys and paraprofessionals broken down by project billing code.
7 Burns Bair maintains computerized time records, which have been filed on the docket with the
8 Firm's monthly fee statements and furnished to the Committee, the Debtor, and the U.S. Trustee
9 in the format specified by the Interim Compensation Order and are attached hereto as Exhibit F.
10 The Committee has reviewed and approved on a monthly basis the fees and expenses requested
11 herein.

12 12. To the extent that time or disbursement charges for services rendered or
13 disbursements incurred relate to the Interim Fee Period but were not processed prior to the
14 preparation of this Application, Burns Bair reserves the right to request additional compensation
15 for such services and reimbursement of such expenses in a future application.

16 **SUMMARY OF SERVICES PERFORMED**
17 **BY BURNS BAIR DURING THE INTERIM FEE PERIOD**

18 13. During the Interim Fee Period, Burns Bair professionals expended 210.10 hours
19 on behalf of the Committee. Of this, 87.80 hours were expended by Burns Bair partners, 115.10
20 by Burns Bair associates, and 7.20 by paraprofessionals. In accordance with the Interim
21 Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and the
22 Local Rules, Burns Bair has classified services performed into four specific categories set forth
23 below. Burns Bair has attempted to place the services provided in the category that best relates
24 to such services; because certain services may relate to one or more categories, however, services
25 pertaining to one category may in fact be included in another category. The following summary
26 of services rendered during the Interim Fee Period is not intended to be a detailed description of
27 the work performed. Rather, it merely highlights certain project billing categories in which
28

1 significant services were rendered by Burns Bair, as well as identifies some of the issues Burns
2 Bair was required to address.

3 **A. Committee Meetings**
4 **Fees: \$9,425.00; Total Hours: 11.90**

5 14. During the Interim Fee Period, Burns Bair attorneys attended Committee
6 meetings and state court counsel meetings for the purpose of advising on case insurance issues.
7 Meetings with the Committee and their state court counsel are a necessary aspect of Burns Bair's
8 legal representation of the Committee.

9 **B. Fee Applications**
10 **Fees: \$7,610.00; Total Hours: 13.50**

11 15. During the Interim Fee Period, Burns Bair prepared four Monthly Fee Statements
12 for the periods of September 1, 2024 through September 30, 2024 [Dkt. No. 870], October 1,
13 2024 through October 31, 2024 [Dkt. 933], November 1, 2024 through November 30, 2024 [Dkt.
14 No. 956], and December 1, 2024 through December 31, 2024 [Dkt. No. 973]. Burns Bair also
15 prepared its Third Interim Fee Application [Dkt. No. 894].

16 **C. Insurance Recovery Activities**
17 **Fees: \$135,394.00; Total Hours: 184.70**

18 16. In addition to the above described tasks, during the Interim Fee Period, Burns
19 Bair expended a considerable number of hours on behalf of the Committee performing additional
20 insurance recovery activities including, but not limited to, preparing for and participating in
21 numerous in-person and Zoom mediation sessions; reviewing and analyzing supplemental
22 insurance document productions from the insurers and the debtor, including revising the
23 Committee's coverage chart in light of same; participating in meet and confers with the Debtor
24 regarding case insurance issues and reconciliation of the parties' coverage charts; legal research
25 and factual analysis regarding insurance issues surrounding lift stay and test case issues;
26 continued research of California insurance law on particular topics in connection with potential
27 Committee insurance litigation and settlement strategies, as well as potential Plan structures; and
28 continue formulating overall insurance strategy on behalf of the Committee, including

1 consideration of mediation issues, Plan structure, and potential test cases and/or insurance
2 demands. These tasks are not meant to be a detailed description of all work performed.

3 **ACTUAL AND NECESSARY DISBURSEMENTS**

4 17. During the Interim Fee Period, Burns Bair incurred a total of **\$11,365.68** in
5 expenses. These expenses relate primarily to travel in connection with in-person mediation
6 sessions, database hosting fees, and payment for court fees. These expenses are reasonable and
7 necessary for the administration of the Chapter 11 Case.

8 **LEGAL BASIS FOR INTERIM COMPENSATION**

9 18. The professional services for which Burns Bair requests interim allowance of
10 compensation and reimbursement of expenses were rendered and incurred in connection with
11 this case in the discharge of Burns Bair's professional responsibilities as special insurance
12 counsel for the Committee in this Chapter 11 Case. Burns Bair's services have been necessary
13 and beneficial to the Committee, the Debtor, its estate, creditors, and other parties of interest.

14 19. In accordance with the factors enumerated in section 330 of the Bankruptcy Code,
15 Burns Bair respectfully submits that the amount requested by Burns Bair is fair and reasonable
16 given the complexity of the Chapter 11 Case, the time expended, the nature and extent of the
17 services rendered, the value of such services, and the costs of comparable services other than in
18 a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the
19 Interim Compensation Order, the Northern District Guidelines, and the UST Guidelines and
20 believes that the Interim Application complies with all of them.

21 **COMPLIANCE WITH LARGE CASE REQUIREMENTS**

22 20. Charts and tables based on such forms, and certain other exhibits, are attached
23 and filled out with data to the extent relevant to this Chapter 11 Case:

24 **Exhibit B:** Customary and Comparable Compensation Disclosures with Fee
25 Applications;

26 **Exhibit C:** Summary of Timekeepers in this Application;

27 **Exhibit D:** Summary of Compensation by Project Category;

28 **Exhibit E:** Summary of Expense Reimbursement; and

Exhibit F: Detailed records for the Compensation Period.

21. Pursuant to paragraph C.5 of the Large Case Guidelines, Burns Bair provides the following statements:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	No. Any time worked on these tasks would have been in connection with preparing monthly fee statements.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	In connection with preparing monthly fee statements, Burns Bair spent approximately .90 hours reviewing invoices for privilege or other confidential information.
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?	N/A

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22. The Applicant understands that the Debtor's estate has sufficient funds available to pay the fees and costs sought herein.

NOTICE

Notice of the Interim Application has been provided to parties in interest in accordance with the procedures set forth in the Interim Compensation Order. Burns Bair submits that, in view of the facts and circumstances of the Chapter 11 Case, such notice is sufficient, and no other or further notice need be provided.

CONCLUSION

Burns Bair respectfully requests an interim allowance to Burns Bair as compensation for fees in the amount of **\$152,429.00** and actual and necessary expenses in the amount of **\$11,365.68** for a total allowance of **\$163,794.68**; and for such other and further relief as this Court deems proper.

Dated: March 6, 2025

Respectfully submitted,

BURNS BAIR LLP

By: /s/ Jesse J. Bair
Jesse J. Bair

*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

Exhibit A

1 Timothy W. Burns (admitted *pro hac vice*)
WI Bar 1068086

2 Jesse J. Bair (admitted *pro hac vice*)

3 WI Bar 1083779

BURNS BAIR LLP

4 10 East Doty Street, Suite 600

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5 Telephone: (608) 286-2302

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7 *Special Insurance Counsel to*

8 *The Official Committee of Unsecured Creditors*

9 **UNITED STATES BANKRUPTCY COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12 In re:

13 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

14 Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

**ORDER APPROVING FOURTH INTERIM
APPLICATION OF BURNS BAIR LLP FOR
ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD
OCTOBER 1, 2024 THROUGH JANUARY 31,
2025**

18 Judge: Honorable Dennis Montali

19 Date: April 10, 2025

20 Time: 1:30 p.m.

21 Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

22
23 On April 10, 2025 at 1:30 p.m., the matter of the *Fourth Interim Application of Burns Bair*
24 *LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period*
25 *October 1, 2024 through January 31, 2025* (the “Application”) [Docket No. ____], filed by Burns
26 Bair LLP (“Burns Bair”), special insurance counsel to the Official Committee of Unsecured
27 Creditors in the above-captioned bankruptcy case, came before this Court for hearing.
28

1 The Court has reviewed and considered the Application and the declaration in support
2 thereof, the *Fee Examiner's Consolidated Final Report Regarding Fourth Interim Fee Applications*
3 (the "Fee Examiner Report") [Docket No. ____], and the statements of counsel at the hearing on
4 the Application.

5 The Court hereby adopts the recommendations in the Fee Examiner's Report as they pertain
6 to Burns Bair. Accordingly,

7 **IT IS HEREBY ORDERED** that:

- 8 1. The Application is GRANTED in the amounts set forth in the Fee Examiner Report.
- 9 2. Burns Bair's fees in the amount of \$152,429.00 and expenses in the amount of
10 \$11,365.68 are hereby approved on an interim basis.
- 11 3. The Debtor is authorized and directed immediately to pay Burns Bair a total of
12 \$66,961.77, reflecting the remaining balance due under the Application.

13
14 APPROVED AS TO FORM:

15
16 _____
Elise S. Frejka, Fee Examiner

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19 ***** END OF ORDER *****
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Court Service List

Registered ECF participants only.

EXHIBIT B

Customary and Comparable Disclosures with Fee Applications

Privacy Act Statement. 28 U.S.C. § 586(a)(3)(A) authorizes the collection of this information. The United States Trustee will use the information contained in this form to evaluate whether compensation and reimbursement of expenses filed by attorneys in larger chapter 11 cases - those cases with \$50 million or more in assets and \$50 million or more in liabilities - are appropriate and reasonable pursuant to 11 U.S.C. § 330. Disclosure of this information may be to a bankruptcy trustee or examiner when the information is needed to perform the trustee's or examiner's duties, or to the appropriate federal, state, local, regulatory, tribal, or foreign law enforcement agency when the information indicates a violation or potential violation of law. Other disclosures may be made for routine purposes. For a discussion of the types of routine disclosures that may be made, you may consult the Executive Office for United States Trustee's systems of records notice, UST-001, "Bankruptcy Case Files and Associated Records." See 71 Fed. Reg. 59,818 et seq. (Oct. 11, 2006). A copy of the notice may be obtained at the following link: <https://www.gpo.gov/fdsys/pkg/FR-2006-10-11/pdf/E6-16814.pdf>.

Failure to provide this information could result in an objection to your fee application, or other action by the United States Trustee. 11 U.S.C. § 330.

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

Category of Timekeeper	Blended Hourly Rate	
	BILLED ¹ Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$977.79	\$1,004.51
Associate	\$513.45	\$536.79
Paralegal	\$374.81	\$340.00
All Timekeepers Aggregated	\$622.67	\$725.51

Case Name: Roman Catholic Archbishop of San Francisco
Case Number: 23-BK-30564
Applicant's Name: Burns Bair LLP
Date of Application: March 6, 2025
Interim or Final: Interim

¹ In addition to traditional hourly matters, Burns Bair also worked on contingent cases where hours are tracked each month, but not billed to the client.

EXHIBIT C

Summary of Timekeepers Included in this Interim Fee Application

NAME OF PROFESSIONAL:	POSITION	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS	TOAL FEES
Timothy W. Burns	Partner	1991	\$1,120.00	45.80	\$51,296.00
Jesse J. Bair	Partner	2013	\$900.00	41.00	\$36,900.00
Jesse J. Bair				1.00	No Charge
Morgan K. Stippel	Associate	2018	\$550.00	8.40	\$4,620.00
Brian P. Cawley	Associate	2020	\$550.00	87.70	\$48,235.00
Alexander Castro	Associate	2024	\$470.00	7.00	\$3,290.00
Katherine L. Sticklen	Associate	2024	\$470.00	12.00	\$5,640.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	5.80	\$1,972.00
Karen Dempski	Paralegal	N/A	\$340.00	1.40	\$476.00
Total:				210.10	\$152,429.00

EXHIBIT D

Summary of Compensation Requested by Category

Category	Hours Billed this Fee Period	Total for Fee Statement
Committee Meetings	11.90	\$9,425.00
Fee Applications	13.50	\$7,610.00
Insurance Recovery Activities	184.70	\$135,394.00
Total:	210.10	\$152,429.00

EXHIBIT E

Summary of Expense Reimbursement

Expense Category	Total Expenses
Court Fees	\$331.05
Database Hosting, CloudNine	\$941.50
Electronic Court Records, PACER	\$4.00
Postage	\$4.04
Travel (flights, taxi, hotels, meals, parking)	\$10,085.09
TOTAL:	\$11,365.68

Exhibit F

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 11/19/2024

Bill # : 01585

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/8/2024	Jesse Bair	Review agenda for Committee meeting (.1); participate in Committee meeting for insurance purposes (1.2); participate in conference with T. Burns re outcome of Committee meeting and case next-steps (.1);	1.40	\$1,260.00
10/23/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re case mediation issues (1.4); participate in conference with T. Burns re outcome of same (.1);	1.50	\$1,350.00
Totals for Committee Meetings			2.90	\$2,610.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/10/2024	Jesse Bair	Correspond with PSZJ and B. Horn-Edwards re fee examiner request for LEDEs data (.1);	0.10	\$90.00
10/10/2024	Brenda Horn-Edwards	Generate LEDES data for Burns Bair third interim fee application and email to E. Frejka and J. Blumberg (.1);	0.10	\$34.00
10/11/2024	Jesse Bair	Correspond with G. Brown re monthly fee statements (.1);	0.10	\$90.00
10/14/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.9); correspond with B. Horn-Edwards re monthly fee statement (.1);	1.00	\$900.00
10/15/2024	Jesse Bair	Correspond with B. Horn-Edwards re next round of interim professional fee applications (.1);	0.10	\$90.00

10/15/2024	Brenda Horn-Edwards	Draft Burns Bair third interim fee application (1.5); correspond with J. Bair re same (.1);	1.60	\$544.00
10/15/2024	Brenda Horn-Edwards	Draft exhibits to Burns Bair third interim fee application (.8);	0.80	\$272.00
10/15/2024	Brenda Horn-Edwards	Draft declaration of J. Bair in support of Burns Bair third interim fee application (.2);	0.20	\$68.00
10/18/2024	Jesse Bair	Correspond with PSZJ re monthly fee statements (.1);	0.10	\$90.00
10/21/2024	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair (.1);	0.30	\$102.00
10/21/2024	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
10/21/2024	Brenda Horn-Edwards	Generate LEDES data and email to E. Frejka and J. Blumberg (.1);	0.10	\$34.00
10/21/2024	Jesse Bair	Correspondence with B. Horn-Edwards re finalization of monthly fee statement (.1);	0.10	\$90.00
10/28/2024	Brenda Horn-Edwards	Revise and finalize third interim fee application, exhibits, and declaration of J. Bair (.3);	0.30	\$102.00
10/28/2024	Brenda Horn-Edwards	Correspond with G. Brown re Burns Bair third interim fee application (.1);	0.10	\$34.00
10/28/2024	Jesse Bair	Review and edit Burns Bair third interim fee application and accompanying materials (1.2);	1.20	\$1,080.00
10/28/2024	Jesse Bair	Review and respond to correspondence with B. Horn-Edwards and G. Brown re finalization and filing of interim fee applications (.2);	0.20	\$180.00
10/31/2024	Brenda Horn-Edwards	File Burns Bair third interim fee application (.1); file declaration of J. Bair (.1); correspond with J. Bair and G. Brown (.1);	0.30	\$102.00
10/31/2024	Brenda Horn-Edwards	Correspond with M. Viramontes re Burns Bair interim fee application (.1);	0.10	\$34.00
Totals for Fee Applications			7.10	\$4,038.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/1/2024	Jesse Bair	Review revised insurance claims analysis (.1);	0.10	\$90.00
10/2/2024	Jesse Bair	Additional correspondence with the debtor re case insurance discussion (.1);	0.10	\$90.00
10/3/2024	Timothy Burns	Review correspondence with the debtor re case insurance call (.1);	0.10	\$112.00
10/3/2024	Katie Sticklen	Analyze case law re insurance issues in connection with potential relief from stay motion (1.0); draft memo summarizing research results (1.2);	2.20	\$1,034.00

10/3/2024	Brian Cawley	Review and analyze recent insurance document production from Appalachian (2.0);	2.00	\$1,100.00
10/4/2024	Alexander Castro	Review recent materials and update memo re Chubb unfair claims handling practices (.6);	0.60	\$282.00
10/4/2024	Katie Sticklen	Review Clergy-III insurance materials (.7); draft memo summarizing same (.9);	1.60	\$752.00
10/7/2024	Timothy Burns	Review and revise draft aggregated data motion (.2);	0.20	\$224.00
10/7/2024	Jesse Bair	Review the Committee's draft motion re aggregate claim data (.1);	0.10	\$90.00
10/7/2024	Jesse Bair	Brief review of case law re insurance estimation issues (.1);	0.10	\$90.00
10/8/2024	Timothy Burns	Participate in conference with J. Bair re outcome of Committee meeting and case next-steps (.1);	0.10	\$112.00
10/9/2024	Timothy Burns	Participate in conference with Committee professionals re potential estimation strategy and preparations for meeting with state court counsel re same (.4);	0.40	\$448.00
10/9/2024	Timothy Burns	Participate in call with Committee professionals and state court counsel re potential estimation strategy (1.0); participate in conference with J. Bair re outcome of same and next-steps (.2);	1.20	\$1,344.00
10/9/2024	Brian Cawley	Participate in Zoom call with the debtor re coverage chart reconciliation, policy materials, and other case insurance issues (1.0);	1.00	\$550.00
10/9/2024	Brian Cawley	Review policy materials received from the insurers and respond to Debtor requests for information re same (.6);	0.60	\$330.00
10/9/2024	Brian Cawley	Finish analyzing insurance documents received from Appalachian and send J. Bair summary of same (.8);	0.80	\$440.00
10/9/2024	Jesse Bair	Participate in Zoom call with the debtor re coverage chart reconciliation and other case insurance issues (1.0);	1.00	\$900.00
10/9/2024	Jesse Bair	Participate in conference with Committee professionals re potential estimation strategy and preparations for meeting with state court counsel re same (.4);	0.40	\$360.00
10/9/2024	Jesse Bair	Participate in conference with T. Burns re outcome of meeting with state court counsel re potential estimation strategy (.2);	0.20	\$180.00
10/9/2024	Jesse Bair	Review correspondence with the mediators and Committee professionals re upcoming call to discuss issues in connection with November 14 mediation (.1);	0.10	\$90.00

10/11/2024	Jesse Bair	Participate in conference with B. Cawley re LMI insolvency issues (.1); answer B. Cawley questions re responding to the debtor's insurance information requests (.2);	0.30	\$270.00
10/11/2024	Brian Cawley	Review and respond to requests from the debtor re follow-up action items from case insurance call (.4);	0.40	\$220.00
10/11/2024	Brian Cawley	Analyze LMI policies and calculate insolvencies impacting coverage (1.2);	1.20	\$660.00
10/12/2024	Timothy Burns	Participate in conference with J. Bair re case strategy, status, and related insurance projects (.1);	0.10	\$112.00
10/12/2024	Jesse Bair	Participate in conference with T. Burns re case status, developments, and related insurance projects (.1);	0.10	\$90.00
10/14/2024	Jesse Bair	Review B. Cawley research memo re key carrier coverage defenses (.1);	0.10	\$90.00
10/14/2024	Jesse Bair	Review B. Cawley research memo re assignments and covenants not to execute under Hamilton (.1);	0.10	\$90.00
10/16/2024	Jesse Bair	Review and respond to correspondence with BB team re review needed of recent Appalachian document production (.1);	0.10	\$90.00
10/17/2024	Karen Dempksi	Download/upload supplemental Appalachian insurance document production (.3);	0.30	\$102.00
10/17/2024	Katie Sticklen	Review and analyze supplemental insurance document production from Appalachian (5.6);	5.60	\$2,632.00
10/18/2024	Katie Sticklen	Finish reviewing and analyzing supplemental insurance document production from Appalachian (2.6);	2.60	\$1,222.00
10/21/2024	Timothy Burns	Participate in conference with J. Bair re upcoming mediation, related insurance projects, and overall Committee insurance strategy (.2);	0.20	\$224.00
10/21/2024	Timothy Burns	Prepare assignments for internal team re insurance estimation issues (.2);	0.20	\$224.00
10/21/2024	Timothy Burns	Participate in BB team conference re upcoming mediation, Committee insurance strategy, and assignments needed in connection with same (.2);	0.20	\$224.00
10/21/2024	Jesse Bair	Participate in conference with T. Burns re case developments, mediation session, and overall Committee insurance strategy (.2);	0.20	\$180.00
10/21/2024	Jesse Bair	Participate in BB team conference re upcoming mediation, Committee insurance strategy, and assignments needed in connection with same (.2);	0.20	\$180.00

10/21/2024	Brian Cawley	Participate in BB team conference re upcoming mediation, Committee insurance strategy, and assignments needed in connection with same (.2);	0.20	\$110.00
10/22/2024	Brian Cawley	Revise and update insurance discovery review index and send to J. Bair (.9);	0.90	\$495.00
10/22/2024	Brian Cawley	Research and analyze Ninth Circuit case law re potential insurance estimation strategy (3.4); draft memo summarizing research re same (1.5);	4.90	\$2,695.00
10/22/2024	Jesse Bair	Review correspondence with the mediators re upcoming Zoom session (.1);	0.10	\$90.00
10/22/2024	Timothy Burns	Review B. Cawley correspondence re Appalachian document production (.1);	0.10	\$112.00
10/23/2024	Timothy Burns	Participate in conference with J. Bair re preparations for upcoming insurance mediation (.2);	0.20	\$224.00
10/23/2024	Timothy Burns	Review and respond to B. Cawley memo re Zoom session with the mediators and next-steps in advance of in-person session with the insurers (.3);	0.30	\$336.00
10/23/2024	Timothy Burns	Participate in conference with J. Bair re outcome of Committee meeting (.1);	0.10	\$112.00
10/23/2024	Jesse Bair	Prepare for Zoom call with the mediators (.1); participate in Zoom session with the mediators re outstanding case issues and preparations for upcoming in-person session (1.0);	1.10	\$990.00
10/23/2024	Jesse Bair	Participate in conference with T. Burns re preparations for upcoming insurance mediation (.2);	0.20	\$180.00
10/23/2024	Brian Cawley	Prepare for Zoom session with the mediators (.1); participate in Zoom session with the mediators re upcoming in-person mediation, ongoing case issues, and preparations needed in connection with same (1.0); draft summary of action items in follow-up to same (.3); participate in conference with T. Burns re insurance estimation research results (.2);	1.60	\$880.00
10/23/2024	Timothy Burns	Participate in conference with B. Cawley re research results re insurance estimation issues (.2);	0.20	\$224.00
10/24/2024	Jesse Bair	Participate in conference with T. Burns re preparations and strategy for upcoming insurance mediation session (.2);	0.20	\$180.00
10/24/2024	Timothy Burns	Participate in conference with J. Bair re preparations and strategy for upcoming insurance mediation session (.2);	0.20	\$224.00

10/27/2024 Timothy Burns	Participate in call with the debtor re upcoming mediation and related insurance issues (.8); correspond with Committee professionals re same (.2);	1.00	\$1,120.00
10/28/2024 Timothy Burns	Correspond with PSZJ re upcoming mediation (.1); participate in call with J. Bair re same (.1); correspond with PSZJ re Committee insurance strategy (.3);	0.50	\$560.00
10/28/2024 Brian Cawley	Supplemental legal research re potential insurance estimation strategy in light of feedback from T. Burns (1.9);	1.90	\$1,045.00
10/28/2024 Jesse Bair	Participate in call with B. Michael re case insurance strategy (.2); correspond with Committee professionals re team meeting to discuss same (.1);	0.30	\$270.00
10/28/2024 Jesse Bair	Participate in conference with T. Burns re upcoming mediation session (.1);	0.10	\$90.00
10/29/2024 Jesse Bair	Review T. Burns email memo re potential estimation strategy (.1);	0.10	\$90.00
10/29/2024 Timothy Burns	Review correspondence with J. Bair and PSZJ re state court counsel meeting and Committee insurance strategy call (.1);	0.10	\$112.00
10/30/2024 Jesse Bair	Review and respond to additional correspondence with Committee professionals re insurance strategy meeting (.1);	0.10	\$90.00
10/31/2024 Jesse Bair	Participate in insurance strategy meeting with Committee professionals (.6);	0.60	\$540.00
10/31/2024 Timothy Burns	Participate in call with PSZJ and J. Bair re upcoming mediation session and case insurance strategy (.6);	0.60	\$672.00
Totals for Insurance Recovery Activities		40.40	\$26,669.00

Total Hours and Fees	50.40	\$33,317.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/01/2024	Third Quarter 2024 PACER	\$4.00
10/21/2024	Postage	\$1.01
Total Expenses		\$5.01

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	0.60	\$470.00	\$282.00
Brenda Horn-Edwards	Paralegal	4.20	\$340.00	\$1,428.00
Brian Cawley	Associate	15.50	\$550.00	\$8,525.00

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jesse Bair	Partner	11.80	\$900.00	\$10,620.00
Karen Dempski	Paralegal	0.30	\$340.00	\$102.00
Katie Sticklen	Associate	12.00	\$470.00	\$5,640.00
Timothy Burns	Partner	6.00	\$1,120.00	\$6,720.00

Total Due This Invoice: \$33,322.01

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 12/19/2024

Bill # : 01793

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2024	Timothy Burns	Participate in Committee meeting for insurance purposes re case mediation issues (1.0);	1.00	\$1,120.00
Totals for Committee Meetings			1.00	\$1,120.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2024	Karen Dempksi	Docket/calendar interm fee application hearing (.1);	0.10	\$34.00
11/13/2024	Jesse Bair	Review and respond to correspondence with Committee professionals re monthly fee statements (.2);	0.20	\$180.00
11/19/2024	Jesse Bair	Correspond with G. Brown and B. Horn-Edwards re Burns Bair monthly fee statement (.1);	0.10	\$90.00
11/21/2024	Jesse Bair	Brief review re fee examiner's questions re Burns Bair interim fee application (.1); correspond with fee examiner re call to discuss same (.1);	0.20	\$180.00
11/23/2024	Jesse Bair	Review fee examiner's questions to Burns Bair's third interim fee application and prepare for meet and confer re same (.3);	0.30	\$270.00
11/24/2024	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00

11/25/2024	Jesse Bair	Prepare for meet and confer with fee examiner (.1); participate in meet and confer with fee examiner re comments and questions re Burns Bair third interim fee application (.6);	0.70	\$630.00
11/27/2024	Jesse Bair	Review the fee examiner's consolidated interim fee app report (.1);	0.10	\$90.00
Totals for Fee Applications			2.00	\$1,576.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2024	Jesse Bair	Participate in brief call with the mediator re case insurance issues (.1);	0.10	\$90.00
11/1/2024	Timothy Burns	Participate in additional call with state court counsel re preparations for upcoming mediation (.1);	0.10	\$112.00
11/1/2024	Timothy Burns	Participate in insurance conference with PSZJ and J. Bair re case insurance strategy and upcoming mediation session (.6);	0.60	\$672.00
11/1/2024	Timothy Burns	Participate in call with state court counsel and J. Bair re mediation and litigation strategy (.1);	0.10	\$112.00
11/1/2024	Jesse Bair	Participate in insurance conference with PSZJ and T. Burns re case insurance strategy and upcoming mediation session (.6);	0.60	\$540.00
11/1/2024	Jesse Bair	Participate in call with state court counsel and T. Burns re mediation and litigation strategy (.1);	0.10	\$90.00
11/4/2024	Alexander Castro	Draft Boicourt letter template re request for disclosure of applicable policy limits and other information (1.4);	1.40	\$658.00
11/4/2024	Timothy Burns	Participate in Zoom mediation session with the mediators and Committee professionals (1.1);	1.10	\$1,232.00
11/4/2024	Timothy Burns	Provide instructions to B. Cawley re preparations needed in advance of upcoming mediation session (.2);	0.20	\$224.00
11/4/2024	Jesse Bair	Participate in Zoom session with the mediators re upcoming in-person session and initial negotiation issues (1.1);	1.10	\$990.00
11/5/2024	Alexander Castro	Case law research re particular requirements of Boicourt letters (.9);	0.90	\$423.00
11/5/2024	Jesse Bair	Review and edit revised debtor coverage chart (.2); review and respond to correspondence with B. Cawley re same and specific changes (.1); correspond with B. Michael re same (.1); participate in conference with T. Burns re insurance mediation strategy (.2);	0.60	\$540.00

11/5/2024	Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.2);	0.20	\$224.00
11/5/2024	Alexander Castro	Continue drafting Boicourt letter template (1.0);	1.00	\$470.00
11/6/2024	Brian Cawley	Revise and update debtor coverage chart to incorporate supplemental materials (2.2); draft summary of material changes for PSZJ (.2);	2.40	\$1,320.00
11/6/2024	Alexander Castro	Supplemental research re California law re particular requirements for reasonable insurance demands in sexual abuse context (1.6);	1.60	\$752.00
11/7/2024	Karen Dempksi	Draft application for admission pro hac vice for B. Cawley (.1);	0.10	\$34.00
11/7/2024	Alexander Castro	Revise and edit Boicourt letter template (.4);	0.40	\$188.00
11/8/2024	Timothy Burns	Participate in Zoom session with the mediators and Committee professionals for insurance purposes re ongoing negotiations and upcoming in-person session (.8);	0.80	\$896.00
11/8/2024	Brian Cawley	Draft email memo re action items in light of Zoom mediation session (.3);	0.30	\$165.00
11/8/2024	Brian Cawley	Participate in Zoom session with the mediators and Committee professionals re ongoing negotiations (.8);	0.80	\$440.00
11/8/2024	Jesse Bair	Participate in Zoom session with the mediators and Committee professionals re ongoing negotiations and upcoming 11/14 in-person session (.8);	0.80	\$720.00
11/9/2024	Timothy Burns	Review Tamayo settlement motions and papers (.2);	0.20	\$224.00
11/9/2024	Timothy Burns	Review BRG's Preliminary Analysis of Debtor's Ability to Pay (.2);	0.20	\$224.00
11/10/2024	Jesse Bair	Review and respond to correspondence with B. Michael re upcoming mediation sessions (.1);	0.10	\$90.00
11/11/2024	Timothy Burns	Review correspondence with B. Michael, the Committee, and state court counsel re upcoming mediation session (.1);	0.10	\$112.00
11/11/2024	Jesse Bair	Review B. Michael correspondence re mediation agenda for upcoming session (.1);	0.10	\$90.00
11/11/2024	Timothy Burns	Review additional correspondence with Committee professionals re 11/14 mediation session (.1);	0.10	\$112.00
11/11/2024	Brian Cawley	Respond to co-counsel questions regarding upcoming mediation (.1);	0.10	\$55.00
11/11/2024	Timothy Burns	Review and respond to correspondence with B. Michael re De Marillac Academy insurance and release issues (.1);	0.10	\$112.00

11/12/2024	Jesse Bair	Review correspondence with the debtor re supplemental document production (.1);	0.10	\$90.00
11/12/2024	Jesse Bair	Participate in conference with T. Burns re preparations and strategy for upcoming mediation session (.1);	0.10	\$90.00
11/12/2024	Timothy Burns	Participate in conference with J. Bair re mediation preparations and strategy (.1);	0.10	\$112.00
11/13/2024	Timothy Burns	Participate in call with state court counsel re mediation strategy (.2);	0.20	\$224.00
11/14/2024	Jesse Bair	Participate in pre-session conference with T. Burns and B. Cawley re mediation preparations and strategy (.3);	0.30	\$270.00
11/14/2024	Brian Cawley	Participate in pre-session conference with J. Bair and T. Burns re mediation preparations and strategy (.3); participate in full-day mediation session for insurance purposes (7.3);	7.60	\$4,180.00
11/14/2024	Jesse Bair	Participate in full-day mediation session for insurance purposes (7.3);	7.30	\$6,570.00
11/14/2024	Timothy Burns	Participate in full-day mediation session for insurance purposes (7.3);	7.30	\$8,176.00
11/14/2024	Timothy Burns	Participate in pre-session conference with J. Bair and B. Cawley re mediation preparations and strategy (.3);	0.30	\$336.00
11/14/2024	Jesse Bair	Prepare for upcoming mediation session, including review of debtor coverage chart, carrier exposure assessments, and prior correspondence with the mediators (.3);	0.30	\$270.00
11/18/2024	Jesse Bair	Review correspondence with the debtor and Committee professionals re third party subpoena (.1);	0.10	\$90.00
11/19/2024	Jesse Bair	Review B. Cawley memo re estimation for insurance purposes and Rule 9019 issues (.1);	0.10	\$90.00
11/19/2024	Jesse Bair	Provide instructions to B. Cawley re test case strategy and next-steps (.1);	0.10	\$90.00
11/19/2024	Jesse Bair	Review K. Sticklen memo re clergy-III insurance document summary (.1);	0.10	\$90.00
11/19/2024	Jesse Bair	Review K. Sticklen memo re insurance lift stay issues (.1);	0.10	\$90.00
11/20/2024	Karen Dempksi	Finalize and file application for admission pro hac vice for B. Cawley (.2);	0.20	\$68.00
11/21/2024	Jesse Bair	Provide instructions to M. Stippel re duty to defend project (.1);	0.10	\$90.00
11/21/2024	Jesse Bair	Conference with T. Burns re preparations and strategy for next mediation session (.1);	0.10	\$90.00
11/21/2024	Jesse Bair	Begin preparing for next mediation session (.1);	0.10	\$90.00
11/21/2024	Timothy Burns	Conference with J. Bair re preparations and strategy for next mediation session (.1);	0.10	\$112.00

11/22/2024	Jesse Bair	Review B. Michael correspondence with the Committee re case developments and upcoming mediation session (.1);	0.10	\$90.00
11/22/2024	Jesse Bair	Review correspondence with B. Michael and the Committee re case updates and next mediation session (.1);	0.10	\$90.00
11/25/2024	Brian Cawley	Review and respond to correspondence with state court counsel re test case issues (.3);	0.30	\$165.00
11/25/2024	Jesse Bair	Provide additional instructions to M. Stippel re insurer duty to defend project (.1);	0.10	\$90.00
11/25/2024	Jesse Bair	Participate in call with B. Michael re case strategy and potential test case motion (.2);	0.20	\$180.00
11/25/2024	Morgan Stippel	Factual analysis in connection with potential duty to defend insurance initiative (.9);	0.90	\$495.00
11/26/2024	Brian Cawley	Supplemental factual analysis in connection with potential test cases and stay relief motion (2.9);	2.90	\$1,595.00
11/26/2024	Brian Cawley	Correspond with state court counsel re test case issues (.1);	0.10	\$55.00
11/26/2024	Jesse Bair	Analysis re insurance attributes of potential test cases (.2); correspond with B. Michael re same (.1); participate in call with B. Michael re same (.1);	0.40	\$360.00
11/26/2024	Morgan Stippel	Begin drafting letter to Debtor re potential breach of the insurers' duty to defend (3.9);	3.90	\$2,145.00
11/27/2024	Jesse Bair	Review and respond to correspondence with B. Michael re potential Committee test case strategy (.1); participate in call with state court counsel re same (.2);	0.30	\$270.00
11/27/2024	Morgan Stippel	Continue drafting letter to Debtor re potential breach of the insurers' duty to defend (1.2);	1.20	\$660.00
Totals for Insurance Recovery Activities			51.50	\$39,324.00

Total Hours and Fees	54.50	\$42,020.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/06/2024	CloudNine, database monthly hosting fee (October 2024)	\$312.50
11/11/2024	Travel meal, J. Bair	\$18.24
11/11/2024	United Airlines, T. Burns (MSN-SFO, Nov. 11-15)	\$726.34
11/11/2024	Airport Parking, J. Bair	\$21.50
11/11/2024	Delta Airlines, J. Bair (MSN-SFO, Nov. 11-15)	\$726.34
11/11/2024	Travel Meal, T. Burns	\$9.35

11/13/2024	Travel meal, B. Cawley	\$37.01
11/13/2024	Travel meal, T. Burns	\$37.20
11/13/2024	Travel Meal, T. Burns	\$9.78
11/13/2024	United Airlines, B. Cawley (MSN-SFO, Nov. 13-16)	\$507.96
11/13/2024	Uber, B. Cawley (airport to hotel)	\$57.47
11/13/2024	Fee for certificate of good standing for B. Cawley	\$3.05
11/13/2024	Hotel, T. Burns (2 nights)	\$850.37
11/13/2024	Uber, B. Cawley (office to airport)	\$17.90
11/13/2024	Hotel, B. Cawley (1 night)	\$353.11
11/13/2024	Hotel, J. Bair (2 nights)	\$850.37
11/15/2024	Uber, J. Bair (hotel to airport)	\$79.23
11/15/2024	Travel meal, T. Burns	\$31.57
11/15/2024	Uber, T. Burns (hotel to airport)	\$124.81
11/15/2024	United Airlines Inflight Wi-Fi, T. Burns (SFO-ORD)	\$8.00
11/15/2024	Travel Meal, T. Burns	\$19.55
11/16/2024	Uber, B. Cawley (hotel to airport)	\$57.57
11/16/2024	Travel meal, B. Cawley	\$41.36
11/20/2024	Fee, Application for Pro Hac Vice, B. Cawley	\$328.00
Total Expenses		\$5,228.58

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	5.30	\$470.00	\$2,491.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	14.50	\$550.00	\$7,975.00
Jesse Bair	Partner	15.20	\$900.00	\$13,680.00
Karen Dempksi	Paralegal	0.40	\$340.00	\$136.00
Morgan Stippel	Associate	6.00	\$550.00	\$3,300.00
Timothy Burns	Partner	12.80	\$1,120.00	\$14,336.00

Total Due This Invoice: \$47,248.58

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**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 1/21/2025

Bill # : 01818

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/10/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re ongoing negotiations and Committee stay relief strategy (.9);	0.90	\$810.00
12/12/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments and upcoming mediation session (1.1);	1.10	\$990.00
12/20/2024	Brian Cawley	Participate in Committee meeting for insurance purposes re mediation outcome and case next-steps (1.4);	1.40	\$770.00
12/20/2024	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re mediation session outcome and next-steps re further mediation and litigation options (1.1);	1.10	\$990.00
Totals for Committee Meetings			4.50	\$3,560.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/2/2024	Karen Dempski	File and serve Burns Bair monthly professional fee statement (.2); correspond with J. Bair re same (.1); Generate LEDES data and email to E. Frejka and J. Blumberg (.1);	0.40	\$136.00
12/2/2024	Jesse Bair	Correspond with K. Dempski re Burns Bair monthly fee statement (.1);	0.10	\$90.00
12/4/2024	Karen Dempski	Prepare draft order re third interim fee application (.1); correspond with J. Bair re same (.1);	0.20	\$68.00

12/4/2024	Jesse Bair	Review text order approving interim fee applications (.1); correspond with BB team re same and drafting Order approving fees (.1); review and edit order (.2); correspond with fee examiner re same (.1);	0.50	\$450.00
12/5/2024	Jesse Bair	Correspond with fee examiner and K. Dempksi re finalization and filing of Order approving interim fees (.1);	0.10	\$90.00
12/5/2024	Jesse Bair	Additional correspondence with K. Dempski re final version of Order granting interim fee application (.1);	0.10	\$90.00
12/19/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.4);	0.40	No Charge
12/19/2024	Jesse Bair	Correspond with B. Horn-Edwards and G. Brown re Burns Bair monthly fee statement (.1);	0.10	\$90.00
12/23/2024	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with G. Brown and B. Horn-Edwards re same (.1);	0.20	\$180.00
12/23/2024	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
12/26/2024	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2);	0.20	\$68.00
12/26/2024	Brenda Horn-Edwards	Generate LEDES data and email to E. Frejka and J. Blumberg (.1);	0.10	\$34.00
Totals for Fee Applications			2.70	\$1,398.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/2/2024	Timothy Burns	Brief review of draft letter to the debtor re potential breach of the insurers' duty to defend (1.); correspond with M. Stippel re same (.1); participate in conference with M. Stippel re same (.2);	0.40	\$448.00
12/2/2024	Morgan Stippel	Finish drafting letter to Debtor re potential breach of the insurers' duty to defend (1.4); correspond with BB team re same (.1);	1.50	\$825.00
12/2/2024	Morgan Stippel	Participate in conference with T. Burns re draft letter to the debtor re potential breach of the insurers' duty to defend (.2);	0.20	\$110.00
12/3/2024	Jesse Bair	Participate in follow-up call with T. Burns re Committee test case strategy and mediation issues (.3);	0.30	\$270.00
12/3/2024	Jesse Bair	Review correspondence with Committee professionals and the mediators re upcoming mediation session and agenda in connection with same (.1);	0.10	\$90.00

12/3/2024	Jesse Bair	Participate in portion of call with Committee professionals re mediation, litigation, and potential test case strategy (.8); brief legal research in connection with same (.1);	0.90	\$810.00
12/3/2024	Brian Cawley	Participate in conference with T. Burns re punitive damages-related coverage assignment (.1);	0.10	\$55.00
12/3/2024	Brian Cawley	Research standard of expected/intended, willful conduct, and punitive damages and interplay between them in connection with case coverage issues (6.4);	6.40	\$3,520.00
12/3/2024	Timothy Burns	Review and respond to correspondence with the mediators and J. Stang re case mediation issues (.2);	0.20	\$224.00
12/3/2024	Timothy Burns	Participate in call with J. Bair re test case strategy and mediation issues (.3); correspond with B. Michael re same (.1);	0.40	\$448.00
12/3/2024	Timothy Burns	Review correspondence with state court counsel re test case issues (.1);	0.10	\$112.00
12/3/2024	Timothy Burns	Review case materials re potential test cases (.8);	0.80	\$896.00
12/3/2024	Timothy Burns	Review California law re occurrence issues (.6);	0.60	\$672.00
12/3/2024	Timothy Burns	Participate in call with Committee professionals re mediation, litigation, and potential test case strategy (1.0);	1.00	\$1,120.00
12/3/2024	Timothy Burns	Participate in conference with B. Cawley re punitive damages-related coverage assignment (.1);	0.10	\$112.00
12/3/2024	Morgan Stippel	Revise draft letter to Debtor re potential breach of the insurers' duty to defend to incorporate suggested revisions from T. Burns (.7);	0.70	\$385.00
12/4/2024	Timothy Burns	Provide instructions to B. Cawley re expected/intended research assignment (.2);	0.20	\$224.00
12/4/2024	Timothy Burns	Participate in call with state court counsel re potential test case motion (.3); correspond with state court counsel re same (.2);	0.50	\$560.00
12/4/2024	Brian Cawley	Research expected/intended and willful conduct exclusion issues in context of sexual abuse and negligent supervision cases in connection with case coverage issues (4.4);	4.40	\$2,420.00
12/4/2024	Brian Cawley	Research punitive damages pleading standard for CVA sexual abuse claims in connection with potential coverage issues surrounding those claims (1.7);	1.70	\$935.00
12/5/2024	Brian Cawley	Continue research re expected/intended and willful conduct standards in connection with case coverage issues (.9);	0.90	\$495.00

12/5/2024	Brian Cawley	Participate in conference with T. Burns re punitive damages / expected or intended coverage research and next-steps re same (.2);	0.20	\$110.00
12/5/2024	Timothy Burns	Review correspondence with PSZJ and the Committee re upcoming Committee meeting (.1);	0.10	\$112.00
12/5/2024	Timothy Burns	Participate in conference with B. Cawley re punitive damages / expected or intended coverage research and next-steps re same (.2);	0.20	\$224.00
12/9/2024	Jesse Bair	Review B. Michael correspondence re adjournment of 12/20 in-person mediation and replacement with Zoom sessions (.1);	0.10	\$90.00
12/9/2024	Brian Cawley	Continue researching interplay between expected/intended exclusion and statutory willful acts exclusions in connection with case coverage issues (2.5);	2.50	\$1,375.00
12/9/2024	Brian Cawley	Finish research re punitive damages pleading standard for CVA sexual abuse claims in connection with potential coverage issues surrounding those claims (1.1);	1.10	\$605.00
12/9/2024	Brian Cawley	Begin drafting memo on interplay between expected/intended and willful acts exclusions and punitive damages standard (1.1);	1.10	\$605.00
12/9/2024	Brian Cawley	Participate in BB team conference re case insurance initiatives, upcoming mediation session, and preparations and strategy in connection with same (.4);	0.40	\$220.00
12/9/2024	Brian Cawley	Correspond with the debtor re policy documents and document requests (.2);	0.20	\$110.00
12/9/2024	Jesse Bair	Participate in BB team conference re case insurance initiatives, upcoming mediation session, and preparations and strategy in connection with same (.4);	0.40	\$360.00
12/9/2024	Timothy Burns	Participate in BB team conference re case insurance initiatives, upcoming mediation session, and preparations and strategy in connection with same (.4);	0.40	\$448.00
12/10/2024	Jesse Bair	Review and respond to correspondence with Committee professionals, the Committee, state court counsel, and the mediators re upcoming mediation sessions (.2);	0.20	\$180.00
12/10/2024	Jesse Bair	Participate in conference with T. Burns re outcome of state court counsel meeting and case next-steps (.2);	0.20	\$180.00
12/10/2024	Brian Cawley	Complete research on punitive damages pleading threshold, expected/intended, and wilful acts (1.8);	1.80	\$990.00

12/10/2024	Brian Cawley	Finish Drafting memo on interplay between expected/intended and willful acts exclusions and punitive damages standard (1.9);	1.90	\$1,045.00
12/10/2024	Timothy Burns	Participate in conference with J. Bair re outcome of state court counsel meeting and case next-steps (.2);	0.20	\$224.00
12/11/2024	Timothy Burns	Review BB internal memo re expected-intended coverage cases (.1); review B. Cawley memo re intentionality issues (.2);	0.30	\$336.00
12/12/2024	Jesse Bair	Participate in conference with T. Burns re Committee insurance test case strategy (.3);	0.30	\$270.00
12/12/2024	Jesse Bair	Participate in call with J. Stang re insurance test case issues (.2);	0.20	\$180.00
12/12/2024	Timothy Burns	Participate in call with J. Stang re test case issues (.1); participate in conference with J. Bair re same (.3);	0.40	\$448.00
12/13/2024	Timothy Burns	Review correspondence from the mediators re upcoming mediation session (.1);	0.10	\$112.00
12/13/2024	Jesse Bair	Respond to correspondence with the mediator and Committee professionals re upcoming Zoom session (.1);	0.10	\$90.00
12/16/2024	Timothy Burns	Review additional correspondence with the mediators and PSZJ re upcoming mediation session (.1);	0.10	\$112.00
12/17/2024	Jesse Bair	Review and respond to correspondence with the mediators and Committee professionals re agenda items for Zoom mediation session (.2);	0.20	\$180.00
12/17/2024	Jesse Bair	Review revised debtor coverage chart in preparation for Zoom mediation session (.1);	0.10	\$90.00
12/17/2024	Jesse Bair	Additional review of case insurance materials in preparation for upcoming mediation session (.2); participate in conference with state court counsel re case insurance strategy (1.3);	1.50	\$1,350.00
12/17/2024	Timothy Burns	Review correspondence with PSZJ and the mediators re agenda items for mediation (.1);	0.10	\$112.00
12/17/2024	Timothy Burns	Participate in conference with state court counsel re case insurance strategy (1.3);	1.30	\$1,456.00
12/18/2024	Jesse Bair	Participate in portion of Zoom mediation session for insurance purposes (1.5); participate in conference with T. Burns re outcome of mediation session (.1);	1.60	\$1,440.00
12/18/2024	Brian Cawley	Participate in portion of Zoom mediation session for insurance purposes (1.5);	1.50	\$825.00

12/18/2024	Timothy Burns	Participate in call with state court counsel re case insurance strategy (.4); conference with J. Bair re mediation session outcome (.1);	0.50	\$560.00
12/19/2024	Jesse Bair	Review draft letter to the debtor re potential breach of the insurers' duty to defend (.1);	0.10	\$90.00
12/19/2024	Timothy Burns	Review B. Cawley correspondence re mediation issues (.1);	0.10	\$112.00
12/19/2024	Timothy Burns	Review correspondence with Committee professionals and state court counsel re strategy meeting (.1);	0.10	\$112.00
12/19/2024	Timothy Burns	Review PSZJ email memo re mediation session outcome and action-items for case next steps (.1);	0.10	\$112.00
12/19/2024	Brian Cawley	Correspond with Committee professionals re mediation summary (.1);	0.10	\$55.00
12/22/2024	Jesse Bair	Review final version of Committee correspondence to the mediators re outstanding action items from last mediation session (.1);	0.10	\$90.00
12/23/2024	Brian Cawley	Begin supplemental review of particular expected/intended and willful acts case law in connection with case insurance issues and related projects (2.3);	2.30	\$1,265.00
12/23/2024	Brian Cawley	Correspond with debtor counsel regarding outstanding discovery requests (.1);	0.10	\$55.00
12/26/2024	Brian Cawley	Analyze correspondence from debtor regarding lost policy materials (.4);	0.40	\$220.00
12/27/2024	Brian Cawley	Analyze recent policy documents and carrier correspondence received from debtor (2.4);	2.40	\$1,320.00
12/27/2024	Brian Cawley	Update Committee coverage chart to incorporate new policy materials received from the debtor (1.9); draft summary of changes for partners (.3);	2.20	\$1,210.00
Totals for Insurance Recovery Activities			48.80	\$33,811.00

Total Hours and Fees	56.00	\$38,769.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/02/2024	Postage	\$1.01
12/05/2024	CloudNine, database monthly hosting fee (November 2024)	\$312.50
12/26/2024	Postage	\$1.01
Total Expenses		\$314.52

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.60	\$340.00	\$204.00
Brian Cawley	Associate	33.10	\$550.00	\$18,205.00
Jesse Bair	Partner	10.60	\$900.00	\$9,540.00
Jesse Bair	Partner	0.40	No Charge	No Charge
Karen Dempski	Paralegal	0.60	\$340.00	\$204.00
Morgan Stippel	Associate	2.40	\$550.00	\$1,320.00
Timothy Burns	Partner	8.30	\$1,120.00	\$9,296.00

Total Due This Invoice: \$39,083.52

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**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 2/18/2025

Bill # : 01856

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/9/2025	Brian Cawley	Participate in Committee meeting for insurance purposes (1.2);	1.20	\$660.00
1/23/2025	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting for insurance purposes re case developments, strategy, and upcoming mediation session (.4); participate in call with T. Burns re outcome of meeting and next-steps (.1);	0.60	\$540.00
1/23/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes (.4);	0.40	\$220.00
1/30/2025	Brian Cawley	Participate in Committee counsel meeting for insurance purposes (1.0); draft email memo re outcome of same and next-steps (.3);	1.30	\$715.00
Totals for Committee Meetings			3.50	\$2,135.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/17/2025	Jesse Bair	Correspond with G. Brown re monthly fee statement (.1);	0.10	\$90.00
1/21/2025	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.6);	0.60	No Charge
1/21/2025	Jesse Bair	Correspond with G. Brown and B. Horn-Edwards re Burns Bair monthly fee statement (.1);	0.10	\$90.00
1/30/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00

1/30/2025	Brenda Horn-Edwards	File and serve monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
1/30/2025	Brenda Horn-Edwards	Generate LEDES data and email to E. Frejka and J. Blumberg (.1);	0.10	\$34.00
1/30/2025	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with G. Brown and B. Horn-Edwards re same (.1);	0.20	\$180.00
Totals for Fee Applications			1.70	\$598.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/6/2025	Timothy Burns	Conference with J. Bair re case strategy and developments (.1);	0.10	\$112.00
1/6/2025	Brian Cawley	Correspond with partners regarding updates to coverage chart and potential next steps (.1);	0.10	\$55.00
1/6/2025	Jesse Bair	Participate in conference with T. Burns re case insurance strategy, related projects, and January mediation session (.1);	0.10	\$90.00
1/7/2025	Jesse Bair	Conference with B. Cawley re additional insurance information still needed from the debtor (.1);	0.10	\$90.00
1/7/2025	Brian Cawley	Participate in conference with J. Bair re debtor insurance document production issues (.1);	0.10	\$55.00
1/7/2025	Brian Cawley	Analyze outstanding insurance discovery still needed from the debtor (.2); correspond with the debtor re same (.2);	0.40	\$220.00
1/9/2025	Brian Cawley	Draft email memo re outcome of Committee meeting and next-steps in light of same (.3);	0.30	\$165.00
1/9/2025	Timothy Burns	Review correspondence with PSZJ and the Committee re mediation issues (.1);	0.10	\$112.00
1/9/2025	Timothy Burns	Conference with J. Bair re insurance strategy and preparations for upcoming mediation session (.1);	0.10	\$112.00
1/9/2025	Jesse Bair	Review B. Cawley memo re outcome of Committee meeting and case next-steps (.1); conference with T. Burns re insurance strategy and preparations for upcoming mediation session (.1);	0.20	\$180.00
1/17/2025	Timothy Burns	Review correspondence with Committee professionals and the mediators re mediation issues and upcoming session (.2);	0.20	\$224.00
1/17/2025	Jesse Bair	Review correspondence with the mediators and Committee professionals re pre-mediation session call (.1);	0.10	\$90.00

1/18/2025	Jesse Bair	Review additional correspondence with the mediators and Committee professionals re pre-mediation call (.1);	0.10	\$90.00
1/19/2025	Timothy Burns	Review correspondence with state court counsel and Committee professionals re Plan standstill (.2);	0.20	\$224.00
1/20/2025	Timothy Burns	Correspond with J. Bair re mediation issues (.1); conference with J. Bair re mediation strategy (.1); conference with B. Cawley re mediation preparation (.1);	0.30	\$336.00
1/20/2025	Jesse Bair	Review and respond to state court counsel correspondence re additional insured issues (.1);	0.10	\$90.00
1/20/2025	Jesse Bair	Review correspondence with PSZJ and state court counsel re stand-still Plan agreement with the debtor (.1); participate in conference with T. Burns re mediation strategy (.1);	0.20	\$180.00
1/20/2025	Brian Cawley	Participate in conference with T. Burns re mediation preparation (.1);	0.10	\$55.00
1/21/2025	Brian Cawley	Correspond with debtor re secondary evidence of certain historical policies (.2);	0.20	\$110.00
1/21/2025	Brian Cawley	Analyze key insurance materials in preparation for upcoming mediation session (1.4);	1.40	\$770.00
1/21/2025	Jesse Bair	Review B. Cawley memo re willful acts, expected or intended, and punitive damages coverage issues (.2);	0.20	\$180.00
1/21/2025	Jesse Bair	Review revised coverage chart and B. Cawley email memo re changes in connection with same (.2);	0.20	\$180.00
1/23/2025	Jesse Bair	Correspond with PSZJ re potential lift stay strategy (.1);	0.10	\$90.00
1/23/2025	Timothy Burns	Participate in call with J. Bair re outcome of state court counsel meeting and case next-steps (.1);	0.10	\$112.00
1/24/2025	Timothy Burns	Review correspondence with PSZJ and the Committee re Plan standstill agreement (.1);	0.10	\$112.00
1/24/2025	Jesse Bair	Review additional correspondence with the Committee and Committee professionals re potential Plan stand-still agreement (.1);	0.10	\$90.00
1/24/2025	Jesse Bair	Review and respond to additional correspondence with PSZJ re potential lift stay strategy (.1);	0.10	\$90.00
1/25/2025	Timothy Burns	Review additional correspondence with state court counsel re Plan standstill issues (.1); correspond with B. Cawley re additional preparations needed for mediation (.2);	0.30	\$336.00

1/26/2025	Jesse Bair	Review and respond to correspondence with B. Cawley and T. Burns re insurance preparation and strategy in advance of upcoming mediation session (.2);	0.20	\$180.00
1/27/2025	Brian Cawley	Analyze additional case insurance materials in preparation for upcoming mediation session (1.6); correspond with T. Burns re same (.2);	1.80	\$990.00
1/27/2025	Brian Cawley	Analyze coverage chart and outstanding coverage issues and draft summaries of same in preparation for mediation (2.9);	2.90	\$1,595.00
1/27/2025	Timothy Burns	Prepare for mediation by reviewing various case insurance materials (2.3);	2.30	\$2,576.00
1/28/2025	Timothy Burns	Continue preparing for upcoming mediation session (1.3);	1.30	\$1,456.00
1/28/2025	Timothy Burns	Participate in portion of full-day mediation session (7.4);	7.40	\$8,288.00
1/28/2025	Brian Cawley	Participate in full-day mediation session (8.0);	8.00	\$4,400.00
1/28/2025	Brian Cawley	Analyze coverage chart and overview materials in preparation for mediation (.7);	0.70	\$385.00
1/28/2025	Jesse Bair	Additional correspondence with PSZJ re lift stay issues (.1);	0.10	\$90.00
1/29/2025	Jesse Bair	Participate in call with T. Burns re mediation session outcome and next-steps (.2);	0.20	\$180.00
1/29/2025	Timothy Burns	Participate in day 2 of mediation session (4.8);	4.80	\$5,376.00
1/29/2025	Timothy Burns	Prepare for day 2 of mediation session (.8);	0.80	\$896.00
1/29/2025	Timothy Burns	Participate in call with J. Bair re mediation session outcome and next-steps (.2);	0.20	\$224.00
1/29/2025	Brian Cawley	Participate in day 2 of mediation session (4.8);	4.80	\$2,640.00
1/29/2025	Brian Cawley	Update coverage chart in light of discussion with debtor (.5);	0.50	\$275.00
1/30/2025	Alexander Castro	Begin drafting memo summarizing research re particular aspects of insurance demands under California law (.5);	0.50	\$235.00
1/30/2025	Jesse Bair	Review B. Cawley email memo re outcome of Committee meeting and correspond with PSZJ re Committee professionals strategy call (.1);	0.10	\$90.00
1/30/2025	Brian Cawley	Correspond with PSZJ re insurance strategy meeting (.1);	0.10	\$55.00
1/31/2025	Timothy Burns	Review and respond to correspondence with BB and PSZJ re case strategy meeting (.1);	0.10	\$112.00
1/31/2025	Timothy Burns	Review Steele Motion for Relief from Stay (.2);	0.20	\$224.00

1/31/2025	Timothy Burns	Review correspondence with B. Michael and state court counsel re state court counsel meeting and agenda items for same (.1);	0.10	\$112.00
1/31/2025	Jesse Bair	Review proposed agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
1/31/2025	Jesse Bair	Review and respond to correspondence with PSZJ and BB team re case strategy call (.1);	0.10	\$90.00
1/31/2025	Brian Cawley	Revise and supplement research memo re particular aspects of insurance demands under California law (.3);	0.30	\$165.00
1/31/2025	Karen DempSKI	Docket/calendar motion hearing for 2/27 (.1);	0.10	\$34.00
1/31/2025	Alexander Castro	Finish drafting memo summarizing research re particular requirements for insurance demands under California law (.6);	0.60	\$282.00
Totals for Insurance Recovery Activities			44.00	\$35,590.00

Total Hours and Fees	49.20	\$38,323.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/09/2025	CloudNine, database monthly hosting fee (December 2024)	\$316.50
01/26/2025	United Airlines Onflight Wi-Fi, T. Burns	\$8.00
01/26/2025	Hotel, T. Burns (3 nights)	\$1,341.76
01/27/2025	United Airlines, T. Burns (MSN-SFO, Jan. 26-30)	\$895.37
01/27/2025	Travel meal, T. Burns	\$19.55
01/27/2025	Travel meal, T. Burns	\$22.29
01/27/2025	Uber, B. Cawley (office to airport)	\$21.94
01/27/2025	Uber, B. Cawley (airport to hotel)	\$55.34
01/27/2025	Hotel, B. Cawley (3 nights)	\$1,341.76
01/27/2025	Travel meal, B. Cawley	\$20.31
01/27/2025	United Airlines, B. Cawley (MSN-SFO, Jan. 27)	\$407.18
01/28/2025	Uber, B. Cawley and T. Burns (hotel to mediation)	\$108.87
01/28/2025	Uber, B. Cawley and T. Burns (mediation to hotel)	\$112.76
01/29/2025	Uber, T. Burns (mediation to hotel)	\$119.80
01/29/2025	Travel meal, T. Burns	\$42.04
01/29/2025	Uber, B. Cawley and T. Burns (hotel to mediation)	\$100.42
01/30/2025	United Airlines, B. Cawley (SFO-MSN, Jan.	\$589.71

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01/30/2025	Travel meal, B. Cawley	\$39.12
01/30/2025	Postage	\$1.01
01/30/2025	Uber, B. Cawley (hotel to airport)	\$59.57
01/30/2025	Uber, B. Cawley (airport to home)	\$26.64
01/30/2025	Travel meal, T. Burns	\$19.55
01/30/2025	Travel meal, T. Burns	\$17.79
01/30/2025	Uber, T. Burns (hotel to airport)	\$130.29
Total Expenses		\$5,817.57

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	1.10	\$470.00	\$517.00
Brenda Horn-Edwards	Paralegal	0.70	\$340.00	\$238.00
Brian Cawley	Associate	24.60	\$550.00	\$13,530.00
Jesse Bair	Partner	3.40	\$900.00	\$3,060.00
Jesse Bair	Partner	0.60	No Charge	No Charge
Karen Dempski	Paralegal	0.10	\$340.00	\$34.00
Timothy Burns	Partner	18.70	\$1,120.00	\$20,944.00

Total Due This Invoice: \$44,140.57